I-64 Capacity Improvements – Segment III

Financial Plan Update

October 30, 2018

VDOT
Virginia Department of Transportation

State Project # 0064-965-229/0064-099-229 P101, R201, C501, B638, B639, B640, B641, B642, B643, D609, D610, D611
Federal # NHPP-064-3(498)/ MHPP-064-3(498)
UPC 106689/109790

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EXECUTIVE SUMMARY

This Design Build project is Segment III of the planned I-64 Capacity Improvements on the Peninsula. The project limits are from 1.15 miles west of Route 199 (Lightfoot, Exit 234) to where the Segment II project ends 1.05 miles west of Route 199 (Humelsine Parkway/Marquis Center Parkway, Exit 242). The 8.2-mile long project lies in York County.

The project is currently under construction and is anticipated to finish by the original planned completion date of September 24, 2021. Recent project activities are:

- Notice to Proceed was issued on January 3, 2018.
- Contractor submitted a baseline schedule in April 2018 and the Scope Validation period ended in May 2018.
- The design build team completed all field, drainage, pipe and bridge situation surveys.
- All project soil borings and existing drainage pipe video inspections are complete.
- Geotechnical Investigations and Utility Designations are complete.
- Baseline noise testing for noise study is complete.
- Citizen Information Meeting held on June 27, 2018 to relay preliminary design and construction schedule, 236 citizens attended.
- Contractor began taking responsibility for interstate maintenance in the corridor on July 3, 2018.

The current total project cost estimate is $244,045,973 and decreased from the Initial Financial Plan estimate of $311,303,819 primarily due to the construction proposal selected being lower than the originally estimated cost. No work orders have been negotiated to date. There is no apparent risk at this time of exceeding the project contingency.

This project is fully funded with HRTAC and SMART SCALE (HB1887) funds. The surplus allocations were a combination of Hampton Roads Transportation Accountability Commission (HRTAC) and SMART SCALE funds in accordance with the Project Agreement.

1. PROJECT DESCRIPTION

I-64 Capacity Improvements – Segment III is located in York County. The project limits are from 1.15 miles west of Route 199, Lightfoot (Exit 234) to 1.05 miles west of Route 199, Humelsine Parkway/Marquis Center Parkway (Exit 242). This will extend the 3-lane section of I-64 from the point where the I-64 Segment II project ends to the west for approximately 8.2 miles. Interstate 64 is functionally classified as an interstate. The VDOT geometric design standard that is being utilized for I-64 is GS-1 (Rural Principal Arterial System) with a minimum design speed of 75 mph. VDOT has initiated this widening project to provide immediate congestion relief to the roadway corridor.

VDOT determined that the use of Design-Build contracting would expedite delivery. The Design-Builder will perform final design, right of way acquisition, and utility relocation and some

construction activities concurrently. This project contributes to the Preferred Alternative and contributes to the Purpose & Need elements outlined in the Final Environmental Impact Statement (FEIS). By striving to balance environmental, scenic, aesthetic, cultural, and natural resources, as well as community and transportation needs, this project incorporates context sensitive design in accordance with the resolution of the Transportation Planning Organization (TPO).

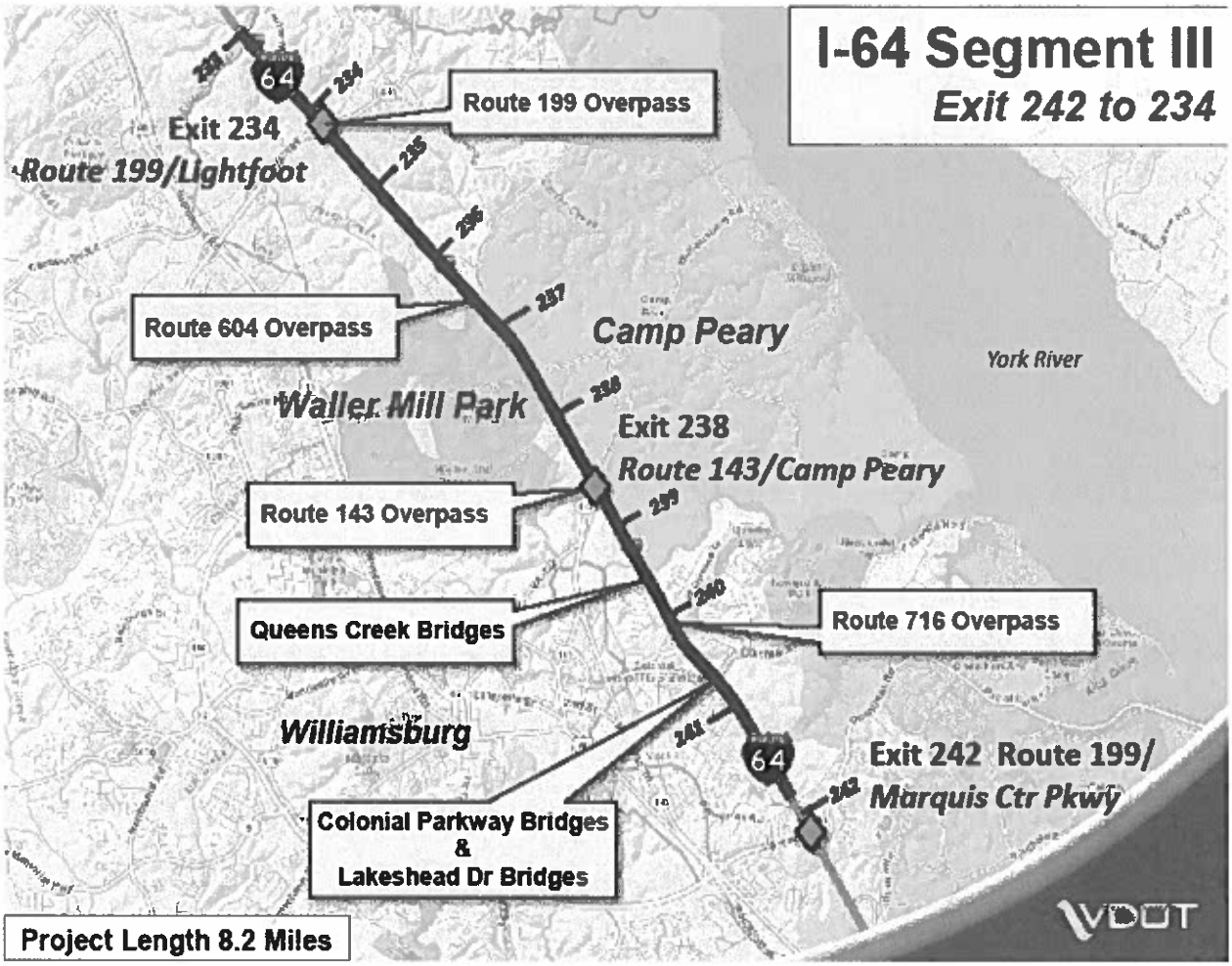


Figure 1: Project Limits

Under the terms of the design-build contract that was awarded by the Commonwealth Transportation Board (CTB) in December 2017, the design-builder will construct the widening of I-64 from a four lane divided interstate to a six lane divided interstate from state milepost 233.3 to state milepost 241.3. The proposed improvements include the reconstruction of the two existing lanes and outside shoulders, and the addition of one 12 foot-wide travel lane and one 12 foot-wide inside shoulder in each direction. On the eastern end, this four-lane section of I-64 ties into the six lane widening project, I-64 Capacity Improvements – Segment II. The widening will occur mostly in the median of the existing interstate, limiting the amount of right of way required to construct the project and avoiding impacts to existing interchanges. These improvements will increase capacity, minimize geometric and structural deficiencies, provide

more lanes for evacuation and improve safety by reducing congestion and improving vehicular level of service.

Four (4) existing bridges within the corridor will be widened to the inside to accommodate the same typical section as the roadway and two (2) existing bridges will be replaced. Three (3) major culverts will be modified, extended and/or rehabilitated due to the interstate widening. Outside shoulders will be widened from 10' to 12' due to the higher truck volume on this section of interstate. All deficient ramp lengths will be lengthened except for two loop ramps at the Route 199 interchange. The loop ramps will not be lengthened due to the need to reconfigure the interchange. The I-64 EB off-ramp to Route 143 shall be reconstructed to add additional capacity as needed per the traffic analysis. Improvements will be made to existing median crossovers for emergency response and maintenance use, paving of all crossovers, and upgrades to comply with current VDOT and AASHTO requirements. Warranted and approved noise barriers will be constructed, based upon the final noise study.

This project will fix non-compliant cross slopes, superelevations and roadway alignments.

The following Design Exceptions (DE) and Design Waivers (DW) have been approved with respect to the RFP Conceptual Plans for this project:

- (DE) Existing bridge outside shoulder width for I-64 westbound lanes (WBL) under Route 143/Camp Peary Overpass does not meet AASHTO Requirements.
- (DE) To allow the addition of bricks on the back face of the new 42" F-shape concrete parapet on the widened side of the Colonial Parkway bridges.
- (DW) Left Total Shoulder Width for I-64 eastbound lanes (EBL) under Route 143 (Camp Peary) Overpass does not meet VDOT Standards.
- (DW) Left Total Shoulder Width for I-64 EBL & WBL under Route 716 (Queens Drive) Overpass does not meet VDOT Standards.
- (DW) The existing and proposed vertical bridge clearance of I-64 over Colonial Parkway does not meet the VDOT Structure and Bridge Manual Requirements.
- (DW) The proposed inside shoulder cross slope of 2% to allow the shoulder to be used as a travel lane during construction does not meet VDOT Standards.

The Virginia Transportation Research Council (VTRC), the research division for the Virginia Department of Transportation (VDOT), is conducting research on Segment II and III of the I-64 Widening Projects. The research includes studying the performance of two pavement recycling techniques by placing instrumentation sensors during construction. The sensors will allow researchers to observe the pavements' performance during its service life and quantify the response to truck loading. By confirming the performance of these sections during the service life, rather than waiting until deterioration begins to develop, VDOT can more quickly implement these recycling techniques on other projects.

The pavement design used includes two pavement recycling techniques: Full-Depth Reclamation (FDR) and Cold Central-Plant Recycling (CCPR). FDR is used to create a solid foundation for the pavement while the CCPR process will create a base layer on top of the FDR.

The primary advantages to using pavement recycling techniques include the potential for cost reductions, reductions in greenhouse gas emissions, and reduced construction time. Previous studies completed by VDOT and other highway agencies have shown that pavement recycling techniques can reduce costs by 30-50% and reduce greenhouse gas emissions by more than 50%. Reusing existing paving materials result in these savings. VDOT estimates that using the recycling techniques on Segment III will save approximately $10 million. In terms of materials reductions, existing milled pavement will be reused and asphalt binder will not be needed. The new pavement has a 30-year design life (VDOT MOI) with the expectation to perform re-surfacing in 12 to 15 years.

PROJECT HISTORY

On August 10, 2016, the Federal Highway Administration (FHWA) issued a Record of Decision (ROD) for the third operationally independent section to be advanced from the FEIS. This section is approximately eight miles with the termini located west of Exit 242 (Marquis Center Parkway/State Highway 199) in the east and west of Exit 234 (Lightfoot/ State Highway 199) in the west. These locations provide logical termini, as improvements will tie back into the existing facility and not significantly impact the existing interchanges. Exits 238 and 234 are the only interchanges located within this section. The ROD was issued for full build condition that added one lane in each direction.

On December 6, 2017, VDOT approved and the CTB recommended award of the I-64 Capacity Improvements – Segment III project to Shirley Contracting Company, LLC (SCC) based on their bid of $178,281,690.

CURRENT ACTIVITIES

First submittal of the 60% roadway plans, which will be used to develop the Joint Permit Application, was received on July 17, 2018. Outside shoulder strengthening was scheduled to begin on July 30, 2018.

The VPDES General Permit for Discharges of Stormwater from Construction Activities is anticipated to be obtained in late August 2018 following submission of the required forms. Copies of all environmental permit submission documentation will continue to be provided to VDOT to ensure full transparency of the status of all environmental permit applications, and copies of the approved permits will be provided once they are obtained.

Once all permits are obtained, specific project requirements including the use of special channel linings or time of year restrictions will be coordinated with the construction team and noted in the final construction plans. Coordination of the final construction plans and approved environmental commitments will ensure that permit obligations are clearly identified to all construction staff to avoid concerns during construction.

Once plans are approved and released for construction, environmental staff will shift to the permit monitoring phase of their activities. Before any work is initiated in the field, SCC

environmental staff will re-mark the limits of jurisdictional wetlands and streams that are not to be impacted during construction. Critical areas will be marked with safety fence or silt fence by construction staff to ensure unpermitted impacts are avoided and sensitive areas are not accessible. Proper erosion and sediment controls will be installed in accordance with the approved plans, and additional elements will be considered based on further coordination between construction, utility relocation, and environmental staff.

Monitoring and inspection throughout the duration of the construction phase of the Project will also ensure compliance with project permits and current VDOT requirements. Dedicated erosion and sediment control staff will inspect the site on a regular basis, paying close attention to the effectiveness of installed Erosion and Sediment Control (E&S) devices. Specific field walks will be conducted after each "major" event as defined by current VDOT requirements, and any damaged or deteriorated measures will be repaired or reinstalled prior to additional work being initiated within the drainage area of the E&S device. In addition to construction staff making regular inspections of the E&S devices, the environmental staff who prepared the permit drawings and documents will make regular visits to the site – at least on a quarterly basis as required by the permit documents – to ensure areas of avoidance are still inaccessible to construction staff and ensure the site is either temporarily or permanently stabilized as required by the permit documents. Channel linings will be checked to ensure the appropriate materials have been used within jurisdictional channel areas, and corrections, if any, will be identified to the construction staff.

PROJECT WEBSITE

Additional information on the I-64 Capacity Improvements project can be found on the project website at the following link:

http://www.i64widening.org/learn_more/segment_3.asp

The website provides additional information regarding project description, purpose, location map, implementation schedule, cost, contact information, etc.

2. SCHEDULE

On January 3, 2018, VDOT issued a Notice to Proceed to SCC and a project Kick-Off Meeting was held on February 14, 2018. Based on the approved baseline schedule, the remaining design efforts are estimated to continue until March 2019. Remaining right of way acquisitions and utility relocations are anticipated to occur before August 2019. Construction activities were anticipated to begin in July 2018. The final completion date is September 24, 2021, or the Offeror's proposed early completion date.

The following activities are from the Design Builder's Technical Proposal.

Begin Stage 1A Construction July 30, 2018

- Perform shoulder strengthening along both I-64 eastbound and westbound only in areas outside of the contractor's unique design concept of narrowed medians.
- Place temporary pavement markings and shift traffic towards outside to allow placement of temporary traffic barrier service adjacent to the median widening.

Begin Stage 1B Construction November 28, 2018

- Construct the median widenings along both I-64 eastbound and westbound.
- Construct one-half portion of the new westbound Bridge B-643 over Queens Creek and demolish and construct new portions of Bridges B-638, and B-641 over Lakeshead Drive, and Bridges B-639 and B-640 over Colonial Parkway Drive.
- Upon completion, shift traffic towards the newly constructed median widening.

Begin Stage 2 Construction September 4, 2019

- Demolish existing asphalt concrete and hydraulic cement pavement.
- Perform Full Depth Reclamation (FDR), reconstruct remaining portion of the existing roadway and, first half of entrance and exit ramps of I-64 Exits 234 and 238.
- Demolish and reconstruct the entire eastbound span of Bridge B-642 over Queens Creek.
- Perform required joint repairs, deck slab extensions, and substructure improvements for remaining portions of Bridges B-638, and B-641 over Lakeshead Drive, and Bridges B-639 and B-640 over Colonial Parkway Drive.
- Majority of noise wall and permanent Stormwater Management Basin construction.

Stage 2B

- Shift traffic at the entrance and exit ramps of I-64 Exits 234 and 238 and then demolish and reconstruct the remaining portions of existing pavement.
- At the Queens Creek crossing, the remaining portion of westbound Bridge B-643 will be demolished and reconstructed to complete the entire westbound span.

Begin Stage 3 Construction September 2, 2020

- Place all surface asphalt, permanent pavement markings, construction signs and complete all "Finishing" items.

Unique Milestone-EB Traffic Open from Sta. 1352+00 to End of Project April 13, 2021

- The contractor has committed to a Unique Milestone to allow traffic full benefit of the third through lane at the eastern terminus of the project as it ties into Segment II.

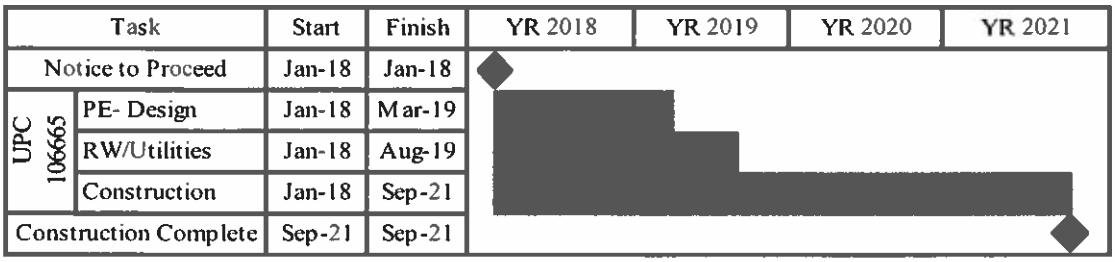
Early Completion / "No Excuse" Incentive June 26, 2021

- The contractor plans to execute and deliver the Project by the June 26, 2021 Early Completion deadline thus earning the full $7,200,000 "No Excuse" Incentive.

Final Completion September 24, 2021

Chart 2.1 below is an approximate anticipated schedule for the selected design-build team:

Chart 2.1: Project Schedule Overview



3. PROJECT COST

VDOT's Project Cost Estimating System (PCES) is the official source for all cost estimate information. The Initial Financial Plan estimate was $311,303,819. The current total project cost estimate is $244,045,973 primarily due to the construction proposal selected being lower than the originally estimated cost. Project costs noted in the estimate below include: preliminary design activities, right of way purchase, utility relocation, environmental and design permits/approvals, survey and geotechnical investigations, and construction.

The Department will pay the Design-Builder $7,200,000 as a "no excuses" incentive payment if Work under the Contract Documents for the Project is completed 90 to 86 days prior to the Final Completion Date. $4,800,000 will be paid if Work is completed at least 85 days prior to the Final Completion Date. For every day less than the 85 days up to and including day 55 the Design-Builder takes to complete the Work of the Project, the incentive payment will decrease at a daily rate of $100,000. The incentive payment for completion of Work on day 55 will be $1,800,000. $1,740,000 will be paid if Work is completed at least 54 days prior to the Final Completion date. For every day less than the 54 days up to and including day 25 the Design-Builder takes to complete the Work of the Project, the incentive payment will decrease at a daily rate $60,000. No incentive payment will be paid for completing all Work 25 days prior to the Final Completion Date or at any date thereafter.

TABLE 3.1: PROJECT COST ESTIMATE

Phase	Initial Financial Plan Estimate	Current Estimate
PE	$10,000,000	$10,000,000
RW	$12,000,000	$12,000,000
CN	$289,303,819	$222,045,973
Total	$311,303,819	$244,045,973

COST ESTIMATING METHODOLOGY

Work elements associated with the I-64 Capacity Improvements – Segment III project can be summarized in two components: (1) work to be carried out under the design-build contract by the design-builder and (2) work outside of the Design-Build contract for which VDOT is responsible or has already accomplished throughout the development of the project.

Design-Build Contract: The awarded Design-Build contract for the I-64 Capacity Improvements project is lump sum and includes the following major work elements to be provided by the design-builder: final design; right-of-way acquisition services; utility coordination; utility relocations; construction; and construction quality assurance and quality control (QA/QC). The estimated cost for the Design-Build contract was developed using the Request for Proposals (RFP) Plans and by adjusting a construction quantity estimate developed for those plans to account for anticipated changes to the project. The Design-Build contract payments are based upon the project physical percent of completion.

Work Outside of Design-Build Contract: VDOT is responsible for updating the EIS documentation; engineering support services; oversight of final design; oversight of right-of-way acquisition services; payment for new right-of-way acquired for the project; landscaping maintenance after project construction; Stream Restoration at a severely eroded project outfall, Design-Build risk contingency; and oversight of construction:

- Engineering: VDOT has executed an agreement with a professional services firm to provide engineering and technical support, specifically for reviewing final design submissions.
- Right of Way Purchases: In accordance with the Design-Build RFP, Part 2, Section 1.5, VDOT remains responsible for the actual cost of the purchase of right-of-way, all easements and miscellaneous fees associated with real estate closings as part of the project and oversight of the right-of-way acquisition/payment/condemnation process.
- VDOT Project Oversight Costs: VDOT post-award costs to manage the project and provide oversight of the project are estimated to be $13,870,480. These costs include overall project management, contract administration and construction oversight.

In addition, other engineering expenditures associated with project development of the I-64 Capacity Improvements project are reflected in the total project estimate.

SUMMARY OF ESTIMATES AND EXPENDITURES

Table 3.2 includes the current estimate of the total cost of the project and the remaining cost-to-complete in year-of-expenditure dollars. The table below depicts the project expenditures as of July 31, 2018.

TABLE 3.2: PROJECT COST BY PHASE as of July 31, 2018

PHASE		ESTIMATE	CURRENT EXPENDITURES	BALANCE TO COMPLETE
106689	PE	$10,000,000	$4,550,331	$5,449,669
	RW	0	0	0
	CN	$112,893,996	$88,254	$112,805,742
	Total	$122,893,996	$4,638,585	$118,255,411
109790	PE	0	0	0
	RW	$12,000,000	$33,405	$11,966,595
	CN	$109,151,977	$12,946,070	$96,205,907
	Total	$121,151,977	$12,979,475	$108,172,502
Grand Total		$244,045,973	$17,618,060	$226,427,913

* CN expenditures on 106689 were transferred to 109790 after July 31st, per HRTAC agreement.

4. PROJECT FUNDS

In March 2016, the Hampton Roads Transportation Accountability Commission (HRTAC) executed a Project Agreement for Funding and Administration with VDOT that authorized $10,000,000 of funding for PE project costs.

Project funding is demonstrated in the HRTPO's Long Range Transportation Plan and Transportation Improvement Program (TIP), as well as the Commonwealth's Statewide Transportation Improvement Program (STIP). The Professional Engineering (PE), Right of Way (RW), and Construction (CN) phases of the Project are include in the HRTPO's TIP as well as the STIP. In March 2016, the Hampton Roads Transportation Planning Organization (HRTPO) amended its Transportation Improvement Program (TIP) to represent $144,927,753 in HPP funds and $166,376,066 HRTF funds.

In December 2016, HRTAC executed the Project Agreement for Funding and Administration with VDOT that authorized $301,303,819 of funding for RW and CN project costs. Due to the awarded Contractor's proposal being lower than the estimated price and the removal of Design Build Risk Management funds from the project budget, the amount of total funding was reduced to $244,045,973 in March 2018.

SIX-YEAR IMPROVEMENT PROGRAM (SYIP) FUNDING

I-64 Capacity Improvements Project – Segment III is fully funded with HRTAC and SMART SCALE (HB1887) funds in the amount of $244,045,973.

State and Federal Sources:
SMART SCALE (HB 1887) funds are allocated to the project in the amount of $121,151,977.

Other Sources:
Hampton Roads Transportation Accountability Commission (HRTAC) Funds: The Final FY 2018-2023 SYIP includes $122,893,996 in Hampton Roads Transportation Funds (HRTF) allocated by the HRTAC.

Table 4.1 summarizes the funding allocated to the I-64 Capacity Improvements – Segment III by fund source and year.

TABLE 4.1: SUMMARY OF FUNDING BY SOURCE AND YEAR

Funding Source		Prev.	2020	2021	2022	Total
UPC 106689	Other: HRTAC (CNRH22)	$ 64,823,668	$ 51,651,130	$ 6,419,198	$ -	$ 122,893,996
UPC 109790	Federal: HB1887 NHPP (HF1100)	$ 3,503,607	$ 955,309	$ 7,715,182	$ -	$ 12,174,098
	Federal: HB1887 NHPP Soft Match (HF1101)	$ 875,902	$ 238,827	$ 1,928,795	$ -	$ 3,043,524
	Federal: HB1887 NHPP Exempt (HF1400)	$ -	$ -	$ 12,677,653	$ -	$ 12,677,653
	Federal: HB1887 NHPP Exempt Soft Match (HF1401)	$ -	$ -	$ 3,169,413	$ -	$ 3,169,413
	Federal: HB1887 STP STWD (HF2100)	$ 24,000,000	$ 17,766,233	$ 6,000,021	$ -	$ 47,766,254
	Federal: HB1887 STP STWD Soft Match (HF2101)	$ 6,000,000	$ 4,441,558	$ 1,500,006	$ -	$ 11,941,564
	Federal: HB1887 HIP Statewide (HF8100)	$ 1,485,724	$ -	$ -	$ -	$ 1,485,724
	Federal: HB1887 HIP Statewide Soft Match (HF8101)	$ 371,431	$ -	$ -	$ -	$ 371,431
	State: HB1887 HPP - State (HS0100)	$ 28,522,316	$ -	$ -	$ -	$ 28,522,316
Grand Total		$ 129,582,648	$ 75,053,057	$ 39,410,268	$ -	$ 244,045,973

The table below demonstrates use of the advance construction (AC) provision to date.

TABLE 4.2: PROJECT AUTHORIZATION SUMMARY

Project Authorization Summary as of June 30, 2018						
Federal Project	**UPC(s)**	**Phase Classification**	**Cost**	**Federal Funds**	**Advance Construction**	**Status**
0643498	106689	PE	$10,000,000	$0	$9,000,000	Active
0643498	106689	CN	$109,577,149	$0	$98,619,434	Active
0643498	109790	RW	$12,000,000	$0	$10,800,000	Active
0643498	109790	CN	$130,296,993	$0	$116,367,293	Active
Total			$261,874,144	$0	$234,786,729	

***Plan to convert AC based on CTB approved FY19-24 SYIP**

5. FINANCING ISSUES

There are no financing issues on this project.

6. CASH FLOW

I-64 Capacity Improvements – Segment III project annual cash expenditures are based on the project schedule. Table 6.1 below is a Cash Flow Analysis for the project. It shows the comparison of previously expended and projected expenditures by fiscal year by phase against the total annual allocations.

TABLE 6.1: CASH FLOW ANALYSIS

	Expenditures	Prev.	FY2020	FY2021	FY2022	Total
UPC 106689	PE	$ 8,000,000	$ 1,000,000	$ 1,000,000	$ -	$ 10,000,000
	Right of Way	$ -	$ -	$ -	$ -	$ -
	Construction	$ -	$ 52,000,000	$ 60,000,000	$ 893,996	$ 112,893,996
UPC 109790	PE	$ -	$ -	$ -	$ -	$ -
	Right of Way	$ 10,000,000	$ 2,000,000	$ -	$ -	$ 12,000,000
	Construction	$ 85,000,000	$ 24,151,977	$ -		$ 109,151,977
	Cumulative Expenditures	$ 103,000,000	$ 182,151,977	$ 243,151,977	$ 244,045,973	$ 244,045,973
	Total Annual Allocations	$ 129,582,648	$ 75,053,057	$ 39,410,268	-	$ 244,045,973
	Cumulative Allocations	$ 129,582,648	$ 204,635,705	$ 244,045,973	$ 244,045,973	$ 244,045,973
	Cash Flow per Year	$ 26,582,648	$ 22,483,728	$ 893,996	$ -	

7. P3 ASSESSMENT

This interstate project cannot be tolled and is not a candidate for delivery via the Public Private Transportation Act (PPTA).

8. RISK AND RESPONSE STRATEGIES

VDOT's current budget in the SYIP for FY2020-2025 is $244,045,973 for I-64 Capacity Improvements – Segment III project.

It is anticipated that the project's $17,828,169 contingency budget included in the project estimate will address all project risks related to the project budget.

The Scope Validation period is closed with only one item noted at a cost of $82,000 to repair an eroded outfall that was not included in the base scope of work. This will be paid for out of the project contingency budget.

The noise analysis is not yet complete and poses the biggest risk to the budget at this time. It has been relayed by the Design Build team that the noise walls included in their base bid and presented at the Public Hearing match the results of their analysis to date. However, until the ENTRADA analysis is complete and the noise study has been approved by VDOT and FHWA, this remains a risk.

9. ANNUAL UPDATE CYCLE

The submission date of the Initial Financial Plan was October 30, 2017. The first annual update will be submitted by October 30, 2018, and will be based on a "data as of" date of July 31, 2018. Future annual updates will be submitted by October 30 of that year, with a "data as of" date of July 31 of that year.

10. SUMMARY OF COST CHANGES SINCE LAST YEAR'S FINANCIAL PLAN

As mentioned in Section 4 Project Funding above, the project total cost of $311,303,819 was reduced by $67,257,846 in March 2018 when the contract award amount was less than initially estimated.

11. COST AND FUNDING TRENDS SINCE INITIAL FINANCIAL PLAN

The project estimate is reduced from $311,303,819 to $244,045,973. As a result of the decreased estimate, the updated current HRTF funding amount is $122,893,996 and the SMART SCALE amount is $121,151,977.

12. SUMMARY OF SCHEDULE CHANGES SINCE LAST YEAR'S FINANCIAL PLAN

There are no schedule changes since Last Year's Financial Plan. The Design Build work began with Notice to Proceed on January 3, 2018 and is scheduled to be completed in September 2021.

13. SCHEDULE TRENDS SINCE INITIAL FINANCIAL PLAN

There are no discernable Schedule Trends since the Initial Financial Plan.